Draft Anacostia Trash TMDL Endpoint Options

Option 1: Use the LA TMDL as a model; i.e. "0" endpoint, but define compliance as achieved through implementation strategies

- Consider including language from the LA TMDL explaining that after 10 years of implementation, the jurisdictions may consider re-assessing the endpoint, but only after a significant reduction in trash is achieved
- Will likely require post-TMDL monitoring (possibly by the MS4s) to assess iterative progress towards the "0" endpoint
- Less resource and time intensive
- Will require buy-in from dischargers

Option 2: Use MD's Trash Rating Scores and COG's in-stream trash loading rates to calculate a TMDL endpoint based on a reference approach

- Trash Rating Score: A 0-20 scale based on the amount of human refuse in the stream and along the banks of the sample segment.
    - Optimal (16-20): Little or no human refuse visible from stream channel or riparian zone
    - Sub Optimal (11-15): Refuse present in minor amounts
    - Marginal (6-10): Refuse present in moderate amounts
    - Poor (0-5): Refuse abundant and unsightly
- Interprets WQS as allowing some level of trash in the river, which meets the definition of a TMDL (realistic, but likely to be controversial)
- Resource and time intensive
- Requires 1-2 years of additional pre-TMDL monitoring throughout the watershed to collect trash rating scores and possibly coincident in-stream trash loading rates

Option 3: Hard "0"

- Impractical and illogical as there may be some quantity of trash in the river in which the designated use would be met

Option 4: User survey

- Highly subjective and very resource and time intensive

Other Considerations:

- Other options?
- Regardless of the option chosen, it may be beneficial to draft an appendix to calculate a new baseline load using new data, but the same methodology (if possible), to assess progress towards achieving the 2010 TMDL. In the appendix, we would likely lay out the current effort of the MS4s and DC Water.